

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA

1:17 CR 460-01

v.

PAULA K. BULLOCK

**DEFENSE MOTION TO
TEMPORARILY MODIFY
CONDITIONS OF PRE-TRIAL
RELEASE and REQUEST FOR
TEMPORARY RETURN OF
PASSPORT**

COMES NOW, the Defendant, Paula K. Bullock, and respectfully requests the Court to modify the conditions of her pre-trial release and allow her to travel out of the country for eight days, and to temporarily return her passport during that period.

FACTS

1. On 20 December 2017, Judge Joseph Webster signed the Order Setting the Conditions of Release for Ms. Bullock.
2. The conditions include unsupervised release, and an unsecured bond of \$20,000.00. Ms. Bullock also surrendered her passport to Pre-Trial Services and was restricted to travel in the Middle District of North Carolina.
3. Ms. Bullock has custody of her 13 year old son, Master F. B-W.

4. Master B-W is an Olympic-level junior snowboard competitor, and has been selected to represent the United States at the “World Rookie Finals” competition in Kitzstienhorn, Austria from April 10th through 15th, 2018.

(Exhibit One – Competition Flyer and Itinerary).

5. Ms. Bullock would like accompany her son to this competition, departing 8 April 2018 and returning 16 April 2018. Master B-W’s travel has already been arranged and funded by the U.S. Snowboard Team and he will be traveling on those days. (Exhibit One – Competition Flyer and Itinerary).

6. In order to accompany and supervise her son, Ms. Bullock requests the Court temporarily lift the condition that she remain in the Middle District of North Carolina, and requests that her passport be temporarily returned to her no later than Friday, 6 April 2018, with the condition that she surrender it back to Pre-Trial Services no later than close of business, 20 April 2018.

7. The Government has been consulted and does not agree to this request.

8. The Government has stated, in conversation with undersigned counsel, that it does not expect this case to be tried in the month of April and, therefore, the requested relief will not delay any trial proceedings.

Argument

Ms. Bullock is not a flight risk. She derives her income from ownership of multiple businesses in North Carolina. Flight from prosecution would

render her without a means of support. Further, as an Olympic-level athlete, Ms. Bullock's son, more than an ordinary child, is bound to the United States. Ms. Bullock would not jeopardize her son's career by removing him from the United States nor would she voluntarily separate herself from her son by flight.

Ms. Bullock has no history of flight nor are the charges in this case serious enough to raise the reasonable belief that she would willingly surrender both her businesses and her child to avoid prosecution. As noted above, this Court has already determined that Ms. Bullock does not require supervision pending disposition of the charges brought against her.

The requested relief inures to the benefit of Ms. Bullock's son, rather than herself. Ms. Bullock's son has the almost unique opportunity to develop into a world-class athlete and competitions such as the one upcoming are instrumental to that development. Ms. Bullock has always attended her son's competitions to provide him the level of emotional support appropriate for a young adolescent. Here, in an international competition on foreign soil, such support will be even more important.

REQUESTED RELIEF

The Defense respectfully requests a temporary modification of the pre-trial conditions of release and temporary return of her passport to her in order for Ms. Bullock to attend her son's competition in Austria.

//Paul M. Dubbeling//
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Certificate of Service

This is to certify that the undersigned has this date electronically filed the foregoing **DEFENSE MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE AND TEMPORARY RETURN OF PASSPORT** with the Clerk of Court using the Court's CM/ECF System, which will send notice to the following:

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This is the 20th day of March, 2018.

/s/ Paul M. Dubbeling
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